

GOTLIB LAW


REQUEST GRANTED.

The Court directs Pretrial Services to temporarily return Ms. Borges' daughter's passport to Ms. Borges for a portion of the day on August 22, 2024 as proposed.

August 16, 2024

Via ECF

8/19/2024 SO ORDERED.



LEWIS J. LIMAN
United States District Judge

The Honorable Lewis J. Liman
United States District Court Judge
U.S. District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Raquel Moura Borges*, 21 Cr. 172 (LJL)

Dear Judge Liman:

I write, with the consent of the U.S. Pretrial Services Office ("Pretrial") and the government to respectfully request that the Court permit Pretrial to temporarily return Ms. Borges' daughter's passport to Ms. Borges for a portion of the day on August 22, 2024.

Ms. Borges was arrested on July 27, 2022, and charged with one count each of securities fraud, wire fraud, and investment adviser fraud. Ms. Borges was released on bond that same day. Ms. Borges's conditions of release include, among others, that she surrender her passport and the passports of her two daughters to Pretrial. Ms. Borges has complied with all the conditions of her pretrial release to date.

Ms. Borges is requesting that she be provided with the passport of one of her daughters for a few hours on August 22, 2024 so that her daughter can bring it with her to an appointment to obtain an NYC identification. If this request is granted Ms. Borges would pick up the passport from Pretrial during the morning of August 22, 2024 and return it in the afternoon on the same day after the appointment. I have provided proof of the appointment to Pretrial and the government. Pretrial Officer Shannon Finneran and the government both consent to this request.

Accordingly, we respectfully request that the Court permit Pretrial to temporarily return Ms. Borges' daughter's passport to Ms. Borges for a portion of the day on August 22, 2024

Respectfully Submitted,

/s/

Valerie A. Gotlib

Cc: Mathew Shahabian, Assistant U.S. Attorney (*via ECF & Email*)
Shannon Finneran, U.S. Pretrial Officer (*via Email*)